

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 24-cr-20188-RUIZ

UNITED STATES OF AMERICA

Plaintiff,

vs.

GERARDO FLOREZ BUESAQUILLO,

Defendant,

and

TOMER KRIHELI,
MARIA MUÑOZ PACHON, and
KOOL KIDS TRANSPORT, CORP.,

Sureties.

/

**AGREED MOTION FOR PARTIAL REMISSION OF FINAL JUDGMENT
OF FORFEITURE OF PERSONAL SURETY BOND IMPOSED AGAINST
TOMER KRIHELI, MARIA MUÑOZ PACHON AND KOOL KIDS TRANSPORT, CORP.**

COMES NOW, the United States of America, Plaintiff, by and through the undersigned Assistant United States Attorney, and Tomer Kriheli, Maria Munoz Pachon, and Kool Kids Transport, Corp., the personal sureties, and hereby move pursuant to Fed. R. Crim. P. 46(f)(2) and (f)(4) for partial remission of the Final Judgment of Forfeiture of Personal Surety Bond imposed against them and in support thereof, state as follows:

1. On September 10, 2024, this Court imposed a personal surety bond against Defendant, Gerardo Florez Buesaquillo signed by Tomer Kriheli, Maria Munoz Pachon, and Kool Kids Transport, Corp., as sureties in the amount of \$150,000.00. [D.E. 58]
2. On December 27, 2024, this Court issued an arrest warrant for Gerardo Florez Buesaquillo for a bond violation fixing bond at none. [D.E. 91 and 126]

3. On January 12, 2025, this Court revoked the bond imposed against Defendant, Gerardo Florez Buesaquillo and entered a Final Judgment of Forfeiture of Personal Surety Bond against Tomer Kriheli, Maria Munoz Pachon, and Kool Kids Transport, Corp. in the sum of \$150,000. [D.E. 93].

4. On February 13, 2025, Defendant Gerardo Florez Buesaquillo was apprehended, arrested and returned to the District Court. [D.E. 126]

5. On May 13, 2025, the Defendant pleaded guilty to conspiracy to launder monetary instruments in violation of 18 U.S.C. § 1956(h). [D.E. 201]. Sentencing is scheduled for July 31, 2025. [D.E. 207].

6. Fed. R. Crim. P. 46 (f)(2) and (f)(4) states,

(f) Bail Forfeiture

(2) Setting Aside. The court may set aside in whole or in part a bail forfeiture upon any condition the court may impose if:

(A) the surety later surrenders into custody the person released on the surety's appearance bond; or
(B) it appears that justice does not require bail forfeiture.

(4) Remission. After entering a judgment under Rule 46(f)(3), the court may remit in whole or in part the judgment under the same conditions specified in Rule 46(f)(2).

7. The United States Attorney's Office has reviewed the timeline of events in this matter and the Court's Final Judgment of Forfeiture and has conferred with the United States Marshal's Service on this matter. Considering all the facts and circumstances surrounding the defendant's capture, the United States and Tomer Kriheli, Maria Munoz Pachon, and Kool Kids Transport Corp. agree that the Court should enter a partial remission of the Final Judgment of Appearance Bond Forfeiture in the amount of \$138,000 plus interest.

8. The parties agree that personal surety, Tomer Kriheli, Maria Munoz Pachon, and Kool Kids Transport Corp. will pay the total sum of \$12,000.00 toward the Final Judgment of

Forfeiture of Personal Surety Bond imposed against them on January 12, 2025, via cashier's check or money order made payable to "U.S. Courts" and referencing the above case number and case style. The payment shall be mailed or delivered to U.S. District Court, 400 North Miami Avenue, Room 8N09, Miami, FL 33128. The payment shall be made within 45 days of this Order.

9. Upon Tomer Kriheli, Maria Munoz Pachon, and Kool Kids Transport Corp.'s payment of the remitted amount of \$12,000, the funds shall be deposited into the Crime Victims Fund pursuant to 42 U.S.C. §10601(b)(3). *United States v. Lunn*, 519 F.Supp.2d 145 (D. Maine, 2007).

WHEREFORE, for the foregoing reasons, the United States of America and Tomer Kriheli, Maria Munoz Pachon, and Kool Kids Transport Corp. respectfully move for an Order pursuant to Fed. R. Crim. P. 46(f)(2) and (f)(4) remitting \$138,000 of the Final Judgment of Personal Surety Bond Forfeiture imposed against Tomer Kriheli, Maria Munoz Pachon, and Kool Kids Transport Corp. directing them to remit payment in the amount of \$12,000.00 to U.S. Courts as described above and directing the Clerk of Court, United States District Court, Southern District of Florida to deposit the funds into the Crime Victim's Fund pursuant to 42 U.S.C. §10601(b)(3) and such other and further relief as this Court deems just and proper.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 30, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

s/Danielle Croke
DANIELLE CROKE